

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK (CENTRAL ISLIP)**

ELLA M. ZANDBAF,
Plaintiff,

CASE NO. 2:20-cv-06022

vs.

CAPITAL ONE BANK (USA), NATIONAL
ASSOCIATION and TRANS UNION, LLC,
Defendants.

**TRANS UNION, LLC'S
NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the Supreme Court Of The State Of New York, Nassau County, to the United States District Court for the Eastern District of New York (Central Islip), on the following grounds:

1. Plaintiff Ella M. Zandbaf served Trans Union on or about December 8, 2020, with a Summons and Complaint filed in the Supreme Court Of The State Of New York, Nassau County. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 1, 20 and 31-34.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court Of The State Of New York, Nassau County, to the United States District Court for the Eastern District of New York (Central Islip).

5. Counsel for Trans Union has confirmed with the Supreme Court Of The State Of New York, Nassau County, online, that they have no document or file suggesting any other Defendant has been served. To the best of Trans Union's knowledge, no other named Defendant in this matter has been served as of the date and time of this Notice Of Removal.

6. Notice of this removal will promptly be filed with the Supreme Court Of The State Of New York, Nassau County, and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the Supreme Court Of The State Of New York, Nassau County, to this United States District Court, Eastern District of New York (Central Islip).

Date: December 10, 2020

Respectfully submitted,

/s/ Camille R. Nicodemus
Camille R. Nicodemus, Esq. (NY# 2807451)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: (317) 363-2400
Fax: (317) 363-2257
E-Mail: cnicodemus@schuckitlaw.com

Counsel for Defendant Trans Union, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **10th day of December, 2020**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
-------	--

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **10th day of December, 2020** properly addressed as follows:

<u>for Plaintiff Ella M. Zandbaf</u> Kenny G. Oh, Esq. Law Offices of Robert S. Gitmeid & Associates, PLLC 30 Wall Street, 8 th Floor, #741 New York, NY 10005	
---	--

/s/ Camille R. Nicodemus
Camille R. Nicodemus, Esq. (NY# 2807451)
Schuckit & Associates, P.C.
4545 Northwestern Drive
Zionsville, IN 46077
Telephone: (317) 363-2400
Fax: (317) 363-2257
E-Mail: cnicodemus@schuckitlaw.com

Counsel for Defendant Trans Union, LLC